

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

V.

VERIZON COMMUNICATIONS, INC. and
VERIZON NEW ENGLAND, INC.

Defendants.

CIVIL ACTION NO. 05-30002-MAP

APRIL 20, 2007

DEFENDANTS' MOTION IN LIMINE
TO EXCLUDE EVIDENCE OF CAREW STREET GRAFFITI

Pursuant to Federal Rules of Evidence 402 and 403, and for the reasons more fully explained in the Memorandum of Law filed herewith, Defendants Verizon Communications, Inc. and Verizon New England, Inc. (collectively, “Verizon”) respectfully move *in limine* to exclude all evidence relating to graffiti that allegedly appeared on a Verizon cross-box on Carew Street in Springfield, Massachusetts in 2003.

Respectfully submitted,

DEFENDANTS, VERIZON
COMMUNICATIONS, INC. AND
VERIZON NEW ENGLAND, INC.

/s/ Stacy Smith Walsh

Victoria Woodin Chavey (*pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2007, a copy of foregoing **Defendants' Motion in Limine to Exclude Evidence of Carew Street Graffiti** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Stacy Smith Walsh

Stacy Smith Walsh